Klaus H. Hamm, OSB No. 091730 klaus.hamm@klarquist.com KLARQUIST SPARKMAN, LLP 121 SW Salmon Street, Suite 1600 Portland, OR 97204

Telephone: (503) 595-5300 Facsimile: (503) 595-5301

Katherine W. Schill, WSB No. 1025887 (pro hac vice) kwschill@michaelbest.com
Melanie J. Reichenberger, WSB No. 1061510 (pro hac vice) mjreichenberger@michaelbest.com
MICHAEL BEST & FRIEDRICH, LLP
100 East Wisconsin Avenue, Suite 3300
Milwaukee, WI 53202

Telephone: (414) 223-2527 Facsimile: (414) 277-0656

Attorneys for Defendants

### IN THE UNITED STATES DISTRICT COURT

#### DISTRICT OF OREGON

#### PORTLAND DIVISION

LEONARD D. DUBOFF, an individual,

Plaintiff,

Case No. 3:13-cv-00436-SI

v.

# STIPULATED PROPOSED SCHEDULE

THE UNIVERSITY OF CHICAGO, an Illinois not-for profit corporation; LAWPROSE, INC., a Texas corporation; and BRYAN A. GARNER, an individual;

Defendants.

In follow-up to the Court's telephonic scheduling conference held on May 23, 2013, the parties propose the following case schedule.

| Event   | <b>Proposed Dates</b>        |
|---|------------------------------|
| Deadline for Initial Disclosures Pursuant to Rule 26(a)(1)  | N/A (parties agree to waive) |
| Deadline to confer as to whether ADR would be beneficial pursuant to LR 16-4(c)                         | June 6, 2013                 |
| Deadline to Amend Pleadings without Leave of Court  | June 28, 2013                |
| Deadline to file Joint ADR Report, requesting or declining ADR, pursuant to LR 16-4(d)                  | June 28, 2013                |
| Close of Fact Discovery on Liability Issues   | September 13, 2013           |
| Disclosure of Liability Expert Reports by party bearing burden of proof on issue(s) addressed in report | October 11, 2013             |
| Disclosure of Rebuttal Liability Expert Reports   | November 15, 2013            |
| Deadline for Filing Dispositive Motions   | December 18, 2013            |
| Deadline for Filing Responses to Dispositive Motions (21 days after service of motion)                  | January 8, 2014              |
| Deadline for Filing Replies on Dispositive Motions (14 days after service of response)                  | January 22, 2014             |
| Opening of All Damages Discovery  | February 21, 2014            |
| Disclosure of Damages Expert Reports by party bearing burden of proof                                   | April 18, 2014               |
| Disclosure of Rebuttal Damages Expert Reports   | May 16, 2014                 |
| Close of Damages Discovery  | June 10, 2014                |
| File Joint Proposed Pretrial Order pursuant to LR 16-5  | June 24, 2014                |
| Deadline for all Rule 26 Pretrial Disclosures and motions in limine                                     | June 24, 2014                |
| Deadline for all Rule 26 Pretrial Objections and responses to motions in limine                         | July 1, 2014                 |
| Final pretrial conference   | July 15, 2014                |

Page 2 - STIPULATED PROPOSED SCHEDULE

| Event      | Proposed Dates     |
|------------|--------------------|
| Jury Trial | July 22 - 24, 2014 |

Dated this 30<sup>th</sup> day of May, 2013.

# KLARQUIST SPARKMAN, LLP

s/Klaus H. Hamm

Klaus H. Hamm, OSB No. 091730 klaus.hamm@klarquist.com KLARQUIST SPARKMAN, LLP 121 SW Salmon Street, Suite 1600 Portland, OR 97204

Telephone: (503) 595-5300 Facsimile: (503) 595-5301

Katherine W. Schill, WSB No. 1025887 kwschill@michaelbest.com Melanie J. Reichenberger, WSB No. 1061510 mjreichenberger@michaelbest.com MICHAEL BEST & FRIEDRICH, LLP 100 East Wisconsin Avenue, Suite 3300 Milwaukee, WI 53202

Telephone: (414) 223-2527 Facsimile: (414) 277-0656

Attorneys for Defendants

#### MCNAMER AND COMPANY P.C.

s/Anthony E. McNamer

Anthony E. McNamer, OSB No. 00138 anthony@mcnamerlaw.com
Deborah E. Gumm, OSB No. 040646 deborah@mcnamerlaw.com
MCNAMER AND COMPANY P.C.
1400 SW Fifth Ave, Suite 300
Portland, OR 97201

Telephone: (503) 727-2500 Facsimile: (503) 727-2501

Attorneys for Plaintiff